STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

AMEREN TRANSMISSION COMPANY OF ILLINOIS	)	
Petition for a Certificate of Public Convenience and Necessity, pursuant to Section 8-406.1 of the Illinois Public Utilities Act, and an Order pursuant to Section 8-503 of the Public Utilities Act, to Construct, Operate and Maintain a New High Voltage Electric Service Line and Related Facilities in the Counties of Adams, Brown, Cass, Champaign, Christian, Clark, Coles, Edgar, Fulton, Macon, Montgomery, Morgan, Moultrie, Pike, Sangamon, Schuyler, Scott and Shelby, Illinois.	)	Docket No. 12-0598

REPLY BRIEF
OF
THE MIDCONTINENT INDEPENDENT SYSTEM OPERATOR, INC.

I. INTRODUCTION

Pursuant to Section 200.800 of the Illinois Commerce Commission's ("ICC") Rules of Practice, the Midcontinent Independent System Operator, Inc. ("MISO") hereby respectfully submits its Reply Brief in the above-captioned matter.[1]

As explained throughout MISO's Initial Post-Hearing Brief, MISO supports the approval of ATXI's planned transmission project, commonly referred to as the Illinois Rivers Project ("IRP" or "Project"). Strong evidence supports approval of ATXI's application for a Certificate of Public Convenience and Necessity pursuant to Sections 8-406.1 and 8-503 of the Illinois Public Utilities Act, as the route and facilities proposed by ATXI have been adjusted during the regulatory approval process before the ICC.

[1] 83 Ill. Adm. Code 200.800.

As the regional transmission organization ("RTO"), MISO is responsible for ensuring that the regional transmission system is reliably planned to provide for existing and expected use of that system.[2] As explained in MISO's Initial Post-Hearing Brief, MISO performs collaborative planning functions for the transmission system with its member transmission owners ("TOs") and other stakeholders while independently assessing regional transmission needs.[3] After an extensive, multi-year, collaborative planning effort, which included information provided by TOs, state regulatory authorities, and other stakeholders, MISO's planning process identified the IRP as a key project that will provide benefits to Illinois as well as the surrounding region. The IRP is an important portion of MISO's Multi-Value Project ("MVP") portfolio of transmission upgrades.[4] The IRP was included in the MVP portfolio that was approved by MISO's Board of Directors on December 8, 2011 as part of MISO's Transmission Expansion Plan (i.e., MTEP11).[5]

Each MVP project is a necessary component of the MVP portfolio that provides benefits that broadly span the MISO footprint. Additionally, as has been demonstrated, the timely construction and proper sequencing of the construction of the entire IRP is important to the ability of the ATXI and Ameren Illinois Company ("AIC") transmission systems to continue their reliable service.[6] Such timely construction is also important to provide Illinois with the economic benefits provided by completion of the MVP portfolio of transmission projects. A

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2 For a general description of MISO and MISO's functions, see MISO Ex. 1.0(Rev) at 4-5 (Webb Direct).
3 MISO Brief at 2 (referencing MISO Ex. 1.0(Rev) at 5 and MISO Ex. 2.0(Rev) at 4-6 (Webb Rebuttal)).
4 ATXI Brief at 6; MISO Brief at 2.
5 Id.
6 ATXI Brief at 59; MISO Brief at 16-17. See also ATXI Ex. 11(Rev) at 10 (Kramer Rebuttal).

delay of any of the segments could cause a delay of the benefits that have been determined to be a key component of the approval of the IRP.[7]

II. REQUIREMENTS FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY

The primary basis for considering whether ATXI's application for the IRP satisfies the requirements of Section 8-406.1 of the Public Utilities Act for a Certificate of Public Convenience and Necessity is set forth in Section 406.1(f) of the Public Utilities Act. 220 ILCS 5/8-406.1(f). This provision was the focus of several initial briefs.[8] As discussed herein, the evidentiary record strongly supports a finding that the entire "Project will promote the public convenience and necessity" and that the entire Project satisfies the three criteria delineated in the statute. 220 ILCS 5/8-406.1(f).

ICC Staff concurs with ATXI and MISO, concluding that the record reflects that the facilities included in the IRP (with limited exceptions) are "necessary to provide adequate, reliable, and efficient service to customers, is the least-cost means of satisfying these service needs, or will promote the development of an effectively competitive electricity market that operates efficiently, and is equitable to all customers, within the meaning of Section 8-406.1(f)(1)."[9]

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7 Staff Brief at 7-8; MISO Brief at 2, 4, 9-12.

8 See, e.g., Staff Brief at 7; Wind on the Wires (WOW) Brief at 3-4; ATXI Brief at 3-4; Moultrie County Property Owners (MCPO) Brief at 7-8; Stop the Power Lines Coalition, et al. (STPL) Brief at 7; Illinois Agricultural Association (Farm Bureau) at 2; Donna Allen at 4; Rural Clark and Edgar County Concerned Citizens (RCECCC) at 4, 6; N. Kohl Grocer Company (N. Kohl Grocer) at 3-4.

9 Staff Brief at 8. See also WOW Brief at 3; ATXI Brief at 5, 13-15.

III. OVERALL NEED FOR THE PROPOSED FACILITIES

ATXI has met its burden to demonstrate that an overall need for the IRP exists.[10] As recognized by ICC Staff and others in their initial briefs, the entire IRP is "necessary because without it, 345 kV and 138 kV transmission facilities in Illinois will be loaded above safe operating levels or operate with inadequate voltage levels."[11] As the RTO responsible for ensuring that the regional transmission system is reliably planned, MISO determined that the need for the Project existed through a deliberate, collaborative stakeholder process, which included the design and planning of transmission projects through a structured, multi-year planning process.[12]

Through its extensive stakeholder process, MISO determined that the Project is necessary to meet local load serving needs of the system in the area, to promote the development of a reliable and efficient competitive electric market, and to ensure that renewable portfolio standards of all states in the MISO footprint can be met while distributing economic benefits from reduced congestion and production costs to ratepayers within the region.[13] The depth and soundness of the collaborative planning process, including the identification of candidate transmission projects, identification of alternatives, and completion of reliability analyses of all identified projects and alternatives, stakeholder vetting, and multiple studies that consider various options and alternatives to designing and structuring needed transmission facilities is

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[10] Staff Brief at 8; MISO Brief at 4; Shelby County Landowners Group (Shelby) at 2; D. Allen Brief at 1 ("I do not question the general need for upgraded transmission lines and increased reliability within Illinois."); N. Kohl Grocer at 4 ("there is sufficient overall need for the Project to justify its construction."); MCPO Brief at 8 (stating that it does not oppose ATXI's demonstration of overall need for the IRP).

[11] Staff Brief at 7. See also ATXI Brief at 8; MISO Brief at 5.

[12] Staff Brief at 8; ATXI Brief at 8. See also MISO Ex. 2.0(Rev) at 6 (Webb Rebuttal); MISO Ex. 1.0(Rev) at 17-24 (Webb Direct).

[13] MISO Brief at 5 (referencing MISO Ex. 1.0(Rev) at 17-26 (Webb Direct)); ATXI Brief at 6-8, 9, 10-15; WOW Brief at 2, 3.

uncontroverted in the record.[14] Several parties also agree that while it may be possible to construct alternative projects to resolve specific loading and voltage issues within Illinois, the IRP is the superior approach because it addresses needs within Illinois as well as within MISO's entire operating region.[15] It is also more cost effective as noted by ICC Staff: "Even if reliability and voltage issues were separately resolved, the aggregate cost of all the separate projects plus a 345 kV transmission line across the state are likely to be higher."[16]

Wind on the Wires ("WOW") noted other benefits to constructing the IRP and adding transmission capacity to Illinois, asserting that studies demonstrate that transmission lines potentially could "act as a hedge against fuel price volatility" and "reduce the ability of electricity suppliers to exert market power over electricity prices."[17] WOW further recognized the benefit of the IRP to Illinois' renewable portfolio standards ("RPS") and the positive effect that the Project would have on renewable electric prices and the cost of compliance with the state RPS.[18] ATXI added that the IRP would provide "additional connectivity across the grid, reducing congestion and enabling access to a broader array of resources by loads in Illinois and elsewhere" at competitive prices.[19]

The record demonstrates that need exists for the entire IRP to be constructed across the State of Illinois. Even the intervening party that questioned certain aspects of the Project expressed the need for this Project: "MISO has stated that as an MVP the benefit-cost ratio for

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[14] Staff Brief at 8; MISO Brief at 5-7; ATXI Brief at 6-8, 16-22. See also MISO Ex. 1.0(Rev) at 17-24 (Webb Direct); Transcript at 262-65 (May 13, 2013); WOW Ex. 1.0 at 7-12 (Goggin Direct).

[15] MISO Brief at 6; Staff Brief at 7; ATXI Brief at 5-6, 10-12, 16-22 (considering all factors, the MVP portfolio, which includes the IRP, "represents the overall best solution for delivering these improvements."). See also Transcript at 235, 265 (May 13, 2013).

[16] Staff Brief at 8. See also WOW Brief at 11-12.

[17] WOW Brief at 3.

[18] WOW Brief at 2, 4-5.

[19] ATXI Brief at 10.

the [IRP] is greater than unity, and we do not at all dispute that point."[20] The Ragheb Family also stated its support for the development of renewable energy resources, and recognized the need for adequately designed transmission lines.[21] The Ragheb Family further expressed its support for a regional approach and transmission projects that span multiple adjacent regions, as well as a national plan.[22] According to MISO Witness Webb, "[t]he MVP portfolio is compatible with all of these designs for further development of the transmission system."[23] The IRP is a component of a larger plan of inter-related transmission projects that span many states throughout MISO's footprint, which will compliment any broader regional or national projects that are subsequently designed.[24] As WOW explained, "the [IRP] is four of a portfolio of seventeen transmission projects approved by [MISO] for development over the next six years in multiple states by multiple transmission owners."[25]

ICC Staff confirmed that its initial concerns regarding the connection of AIC's existing facilities to the proposed transmission line, in order to realize all of the benefits of the IRP, have been satisfied.[26] Thus, the only issues that remain for the Commission to resolve are how the overall IRP is designed, where the facilities are located, and when the IRP will be constructed. Each of these issues will be discussed herein.

The Design of the IRP

Just as the completion of connections to existing facilities is a necessary component of the IRP, it is imperative that the entire IRP be completed as proposed. MISO continues to be

[20] Ragheb Family Brief at 2.
[21] Ragheb Family Ex. 1.0R at 6-9 (Ragheb Direct)(supporting the overall concept of the Project).
[22] Ragheb Family Brief at 4.
[23] MISO Ex. 1.0 (Rev) at 7 (Webb Direct).
[24] MISO Brief at 2; ATXI Brief at 6, 9; Staff Brief at 8.
[25] WOW Brief at 1-2.
[26] Staff Brief at 9.

concerned with the negative impact, both in Illinois and elsewhere, that would result from not constructing the IRP as part of the MVP portfolio as planned. Reliability, economic, and other negative implications will result if the IRP is not approved as designed.[27] If not constructed as planned, the most cost-efficient expansion plan designed to meet local and regional needs will not be able to deliver the reliability, economic, renewable, and other benefits to serve short- and long-term needs that it was designed to achieve.[28] Additionally, not constructing the Project as planned will result in the inability of the existing ATXI and AIC systems to continue to provide reliable service.[29]

The design was achieved through the extensive stakeholder process described herein and was open to all stakeholders, who had multiple opportunities to present their alternatives and ideas for consideration.[30] The process considered various alternatives and resulted in a carefully designed plan, taking into account many factors.[31] "The process was not a 'rush to market.'"[32] Any modification to the design of the system will likely result in "tradeoffs" that could negatively impact the benefits (e.g., alternative designs could be more costly; constructing parallel lines raises operational and reliability concerns; constructing common or adjoining rights-of-way are susceptible to common-mode failures; adverse impacts could occur on other landowners; etc.).[33] As ATXI explained, the proposed routes were selected because "they best balanced these tradeoffs and: i) resulted in the lowest potential for impact overall; ii) best

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[27] MISO Brief at 9; ATXI Brief at 9, 14-22. See also MISO Ex. 1.0(Rev) at 31 (Webb Direct).
[28] ATXI Brief at 13-15; MISO Brief at 9.
[29] ATXI Brief at 9; MISO Brief at 9.
[30] ATXI Brief at 6-10.
[31] ATXI Brief at 20-21.
[32] ATXI Brief at 8 (responding to the claims by Ragheb Family that the process was somehow rushed and alternatives were not considered).
[33] ATXI Brief at 16-20.

represented public input; iii) could be permitted; iv) could be constructed; and v) are cost effective."[34]

Where the IRP is Constructed

The entire IRP should be constructed as designed, including the sequencing of the construction, in order to ensure that the transmission system's integrity is not affected and reliability is not impacted. MISO focuses on the reliability and stability of the transmission system in the region, and coordination with neighboring planning regions, while the TOs are responsible for their local systems.[35] Pursuant to MISO's Transmission Owner Agreement ("TOA"), MISO's TOs are obligated to construct and connect transmission facilities, and the TOs have an ongoing responsibility to continuously review and plan to reliably and efficiently meet the needs of their local systems.[36] Thus, MISO's Initial Post-Hearing Brief focused on the need for the entire IRP and the need for its backbone components and related facilities, such as the Mt. Zion substation (as discussed in Section F.1 below), and MISO did not focus on the route selection of any of the transmission facilities.[37]

When the IRP is Constructed

To achieve the intended benefits, it is important that the entire IRP be constructed as planned, and that the Commission approves all segments in this proceeding for construction when planned.[38] Removing segments and considering them piecemeal in future proceedings, as recommend by ICC Staff,[39] will cause unnecessary delay to the IRP and MISO's broader,

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[34] ATXI Brief at 19-20.
[35] ATXI Brief at 6-10, 13-15; MISO Brief at 12.
[36] ATXI Brief at 13-15; MISO Brief at 12.
[37] MISO Brief at 12.
[38] ATXI Brief at 9, 59.
[39] Staff Brief at 40-41.

regional plan (the MTEP portfolio of projects).[40] The MTEP is a complex system that will service both short- and long-term needs of the bulk electrical grid in a coordinated manner. Considerable re-design or delay could occur if a key element of the regional expansion plan, such as the IRP or other connecting segments of the MVP, is not constructed.[41] This delay could increase expenses and impact the addition of new generation supplies required to serve customers reliably.

As explained in MISO's Initial Post-Hearing Brief, the IRP is not only needed, but needed on a timely basis to prevent negative "ripple effects" from occurring from failure to construct a necessary component of the MVP portfolio.[42] Failing to complete a portion of the IRP, as ICC Staff suggests,[43] would create reliability problems at the point of any missing link in the 345 kV transmission system:[44]

> For the benefits of the Project to be realized, the Project *must connect* to the existing system and deliver energy to the load. This resulted in the selection of certain substation locations as "drop off" points for the Illinois MVPs, at which the MVPs could connect to the existing 138 kV system and thereby provide the needed reliability benefits. The substations selected provide access to numerous 138 kV lines which distribute the energy throughout Illinois. ATXI concluded that the Project *so connected* eliminates the projected exposure to several post contingency overloads, and eliminates the projected exposure to low voltages and potential voltage collapse from several double contingency scenarios.

A missing link in the transmission system would result in new flows from the 345 kV path to the lower voltage system at the point of the missing portion of the IRP.[45]

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[40] MISO Brief at 15-17; ATXI Brief at 59.
[41] ATXI Brief at 9; MISO Brief at 15.
[42] MISO Brief at 15(citing MISO Ex. 2.0(Rev) at 9 (Webb Rebuttal)). See also ATXI Brief at 9, 59.
[43] Staff Brief at 40-41.
[44] ATXI Brief at 9 (citations omitted)(emphasis added). See also ATXI Brief at 59; Transcript at 370, lns 2-5 (May 14, 2012)("considerable reliability issues at the point that you stopped the line").
[45] Transcript at 370, lns 7-8 (May 14, 2013) ("find low voltage local area systems").

As ATXI explained, the preferred construction sequence has been chosen to help minimize any disruptions to the transmission system during construction of the Project.[46] Additionally, the benefits expected from addressing local reliability and economic needs would similarly be missing. Full benefits cannot be achieved if the system is not connected to the generation sources.[47]

ICC Staff argued that the Commission should not approve certain line segments connecting to the Mt. Zion substation, stating that non-approval at this time should not delay the IRP or sequencing proposed by ATXI as shown on ATXI Ex. 2.4. ICC Staff observed that those segments do not have in-service dates until 2018.[48] ICC Staff also argued that the delay of those segments will not affect the Pana to Mt. Zion segment that is scheduled for a 2016 in-service date.[49] ICC Staff, however, also questioned the need for the Pana-Mt. Zion segment and the location of the Mt. Zion substation, which is scheduled to be in-service in 2016.[50] If certain segments are not approved in this docket and segment connections and substation locations are debated in a subsequent docket, construction would be delayed in the Decatur area where a 2016 in-service date is required.[51] It is unreasonable to construct a substation or other line segments without knowing the ultimate route design. Illinois customers should not be asked to pay for facilities that are later not used because the substation location moved or another connection was deemed to be unnecessary pursuant to the outcome of a subsequent proceeding.

The entirety of the IRP should be constructed in a timely fashion, and these time sensitive portions of the IRP should be approved as part of the overall IRP in order to serve customer

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[46] ATXI Brief at 59.
[47] ATXI Brief at 9.
[48] Staff Brief at 41.
[49] Id.; ATXI Brief at 59.
[50] Staff Brief at 41.
[51] ATXI Brief at 59.

needs in Illinois. Additionally, the proper sequencing of the construction of the Project segments and facilities should be maintained to eliminate missing links in the system, prevent temporary system overloads, reduce the creation of system congestion, and to minimize the overall disruption of the transmission system during construction and commissioning of the Project.[52] Accordingly, attempts to delay the approval of certain segments or substations (and related facilities) of the IRP should be rejected.

IV. LEAST-COST AND THE PROPOSED TRANSMISSION LINE ROUTES

Several parties recognized that spreading the costs to correct local reliability and voltage issues across the entire MISO footprint as part of the regional IRP would be a lower-cost option than Illinois customers bearing the cost to correct local reliability and voltage issues as separate projects.[53]

F. Pana – Kansas

1. Need for Mt. Zion Substation

ICC Staff concurs with MISO, ATXI, and other parties that the Mt. Zion substation is needed as an important component of the overall Project to provide the full MVP benefits and to address future reliability issues in the Decatur area.[54] The record demonstrates that the Project will also address transmission overloading events and low-voltage concerns in the Decatur

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[52] ATXI Brief at 59.

[53] Staff Brief at 7-8; MISO Brief at 12; ATXI Brief at 5-6, 15; Ragheb Family Brief at 4 ("We do not dispute or question the testimony by MISO in regards to the [P]roject being able to deliver energy in a manner that is more reliable and/or more economic than the *status quo*."). See also Staff Ex. 1.0R at 6 (Rockrohr Direct); Transcript at 272 (May 13, 2013).

[54] Staff Brief at 24; MISO Brief at 12; ATXI Brief at 55-59; Shelby Brief at 3 ("Based on the examination by the experts at ATXI, the Mt. Zion substation is necessary to mitigate reliability issues in Decatur, Illinois area, as the proposed alternate direct from Pana-Kansas (bypassing Mt. Zion) will not mitigate the issues.").

area.[55] ICC Staff explained that the Mt. Zion substation is needed to supply the local area with an additional 345 kV source.[56]

As demonstrated herein, elimination of a key element of the IRP that will address reliability issues and provide full MVP benefits to Illinois could cause the Project to be reevaluated by MISO and its stakeholders so that MISO may ensure that any redesign[57] of the Project will continue to meet the initial needs attributed to the Project.[58] A redesigned project may also have to obtain approval from MISO's Board of Directors.

V. MANAGING AND SUPERVISING THE CONSTRUCTION PROCESS

As recognized by several parties, the record supports a finding that ATXI satisfies Section 8-406.1(f)(2) of the Public Utilities Act as noted above.[59]

VI. FINANCING THE PROPOSED CONSTRUCTION

As recognized by several parties, the record supports a finding that ATXI satisfies Section 8-406.1(f)(3) of the Public Utilities Act as noted above.[60]

VII. OTHER—DELAY AND TIMING OF CERTAIN SEGMENTS

As stated above, ATXI has demonstrated that need exists for the proposed transmission facilities. Additionally, there is a pressing reliability need to proceed in a timely manner with

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[55] ATXI Brief at 55-56; MCPO Brief at 9; MISO Brief at 12.
[56] Staff Brief at 24.
[57] As stated previously, MISO is referencing the redesign of backbone elements of the IRP if those components are not constructed or are delayed. MISO is not referencing here the route design or route selection as implied by the Coalition of Property Owners in Piatt, Douglas and Moultrie Counties (PDM). See PDM Brief at 16.
[58] MISO Brief at 13 (referencing MISO Ex. 2.0(Rev) at 9 (Webb Rebuttal)).
[59] ATXI Brief at 94; Ragheb Family Brief at 8; MISO Brief at 13; N. Kohl Grocer at 7.
[60] ATXI Brief at 96; MISO Brief at 14; N. Kohl Grocer at 8.

the Mississippi River to Quincy, Quincy to Meredosia, and Pana to Mt. Zion segments: "The proposed in-service dates range from 2016 to 2018. In particular, the following portions have in-service dates of 2016: River to Quincy, Quincy to Meredosia, and Pana to Mt. Zion and Sidney to Rising that could be affected by any delay."[61] MISO is concerned that any delay in completing all segments of the IRP could disrupt MISO's regional plan, affecting other states and projected in-service dates, and causing reliability concerns to not be addressed in a timely manner.[62] Additionally, any delay in completing portions of the IRP (particularly portions in the middle of the transmission line) will correspondingly delay any benefits that the IRP could provide as the transmission segments will not be connected to each other and, therefore, cannot deliver the benefits to the State of Illinois. ICC Staff recognized the benefits of having inter-related transmission projects as part of the larger IRP: "[R]esolving the reliability and voltage issues as part of the larger [IRP] would be beneficial to electric customers in Illinois."[63]

Through the multi-year planning process, many alternatives were discussed and analyzed with TOs and stakeholders, including alternative routes, design, voltages, and technologies.[64] The Ragheb Family continues to question the selection process, the proposed design of the IRP, and claims other alternatives may be viable.[65] However, this argument simply "ignores the extensive, comprehensive and lengthy MVP development process, going back to at least 2008 ... — a process that was open to all stakeholders, who had multiple opportunities to present their alternatives and ideas for consideration, and considered various alternatives."[66]

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[61] ATXI Brief at 10 (citations omitted). See also MISO Brief at 14; ATXI Ex. 2.4.
[62] See MISO Ex. 1.0(Rev) at 31-32 (Webb Direct).
[63] Staff Brief at 8; ATXI Brief at 15.
[64] ATXI Brief at 8, 14; MISO Brief at 12(referencing MISO Ex. 2.0(Rev) at 4-6, 8-9 (Webb Rebuttal)).
[65] Ragheb Family Brief at 2-4, 9-11.
[66] ATXI Brief at 8.

Additionally, the Ragheb Family stated that this proceeding focused on ATXI's application and that parties did not have the opportunity to examine MISO's processes.[67] MISO responded to numerous discovery requests by more than one party during the length of this proceeding, including requests about MISO's planning process, but MISO did not receive a single inquiry by the Ragheb Family on any subject.[68] Thus, although Dr. Ragheb stated that he was unaware of MISO's planning process at the outset of the proceeding, he chose not to seek additional information from MISO or inquire into MISO's planning process.[69] The Ragheb Family did, however, serve discovery on ATXI.[70] A party's lack of diligence in discovery and indifference to obtaining factual information is not cause for the Commission to question MISO's planning process that resulted in the proposed IRP design. MISO's regional planning process provides ample opportunity for stakeholder vetting of alternative proposals in a structured manner that includes all stakeholders in MISO's transparent regional planning process.[71]

As ATXI and MISO have emphasized, the IRP should be examined holistically and not in a piecemeal manner in order to ensure that all benefits are obtained in the necessary timeframe at the lowest total cost to customers.[72] MISO Webb has aptly concluded: "The Project as proposed by ATXI is a necessary project that meets local load serving needs in the area. The

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[67] See Ragheb Family Brief at 2-4, 9-11. The Ragheb Family was granted intervention in this proceeding with the full powers and rights granted to intervening parties, including ample rights to discovery. Although the Ragheb Family was apparently aware of such rights as they served discovery on ATXI, they chose not to pursue discovery of MISO and request the documents or data that they are now seeking.

[68] Transcript at 700 (May 16, 2013).

[69] Transcript at 700 (May 16, 2013).

[70] Transcript at 698-99 (May 16, 2013).

[71] MISO Brief at 13 (referencing MISO Ex. 2.0(Rev) at 8 (Webb Rebuttal)).

[72] MISO Brief at 17; ATXI Brief at 59.

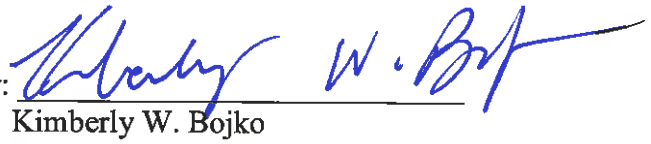
Project is an integral part of MISO's Regional Plan for the continued development of a reliable and efficient regional transmission system."[73]

WHEREFORE, MISO respectfully requests that the Commission grant a Certificate of Public Convenience and Necessity to ATXI and issue an order authorizing or directing the construction of the Project. The IRP should be approved as proposed and as adjusted by the efforts of ATXI in this proceeding. The timely construction of the IRP is important to the ability of the transmission system in Illinois to continue reliable service and to deliver the economic benefits of the MVP portfolio of transmission projects to Illinois.

MISO's regional planning included MISO, transmission owners, and other stakeholders carefully considering the Project and approving the Project as the best approach. Any delay of the Project could inhibit the benefits of the Project from reaching the customers of Illinois in a timely fashion and by the least cost means.

Dated: June 10, 2013

Respectfully submitted,
THE MIDCONTINENT INDEPENDENT
SYSTEM OPERATOR, INC.

By: 

Kimberly W. Bojko
Carpenter Lipps & Leland LLP
280 Plaza, Suite 1300
280 North High Street
Columbus, Ohio 43215
Telephone: (614) 365-4100
Facsimile: (614) 365-9145
bojko@carpenterlipps.com

[73] MISO Brief at 17 (citing MISO Ex. 2.0(Rev) at 14-15 (Webb Rebuttal)).

Colleen A. Check
Carpenter Lipps & Leland LLP
180 N. LaSalle Street
Suite 2640
Chicago, IL 60601
Telephone: (312) 777-4300
Facsimile: (312) 777-4839
check@carpenterlipps.com

Jeffrey L. Small
MISO
P.O. Box 4202
Carmel, IN 46082-4202
Telephone: (317) 249-5248
Facsimile: (317) 249-5912
jsmall@misoenergy.org